

The Honorable Kymberly K. Evanson

UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

SHENZHEN ROOT TECHNOLOGY
CO., LTD., et al.,

Plaintiffs,

v.

CHIARO TECHNOLOGY LTD.,

Defendant.

No. 2:23-cv-00631-KKE

**DECLARATION OF JEREMY
ROLLER IN SUPPORT OF
MOMCOZY'S MOTION TO
CONTINUE PRE-TRIAL
DEADLINES AND STRIKE TRIAL
DATE**

Note on Motion Calendar:
June 25, 2024

CHIARO TECHNOLOGY LTD.,

Counterclaim Plaintiff,

v.

SHENZHEN ROOT TECHNOLOGY
CO., LTD., et al.,

Counterclaim Defendants.

I, JEREMY ROLLER, declare as follows:

1. I am a member of the law firm Arete Law Group PLLC, counsel for
Plaintiffs/Counterclaim Defendants Shenzhen Root Technology Co., Ltd. (aka Shenzhen

1 Lutejiacheng Network Technology Co., Ltd.), Hong Kong Lute Technology Co., Limited,
 2 Shenzhen Conglin E-Commerce Co., Ltd, Shenzhen Jinruihang Technology Co, Ltd., and
 3 Shenzhen Xitao Network Technology Co., Ltd. (collectively, “Momcozy”). I make this
 4 declaration upon personal knowledge and, if called to testify, could and would testify
 5 competently to the facts set forth herein.

6 2. Even prior to this Court’s granting Chiaro Technology, Ltd.’s (“Elvie”) Motion to Amend Counterclaims, Momcozy attempted to negotiate an agreed extension of
 7 the case schedule with Elvie. Attached hereto as **Exhibit A** is a true and correct copy of an
 8 email my co-counsel, Qianwu Yang, sent to Josephine Kim, one of Elvie’s lawyers, on April
 9 9, 2024. Ms. Kim’s April 11, 2024 response to Mr. Yang’s April 9, 2024 email is attached
 10 hereto as **Exhibit B**. Counsel for the Parties briefly discussed potential changes to the
 11 scheduling order in a conference on April 11, 2024, but were unable to reach agreement.

12 3. On May 10, 2024, I emailed Ms. Kim regarding a proposed revised case
 13 schedule. A true and correct copy of my May 10, 2024 email to Ms. Kim is attached hereto
 14 as **Exhibit C**. On May 14, 2024, Ms. Kim responded to my email. A true and correct copy of
 15 Ms. Kim’s May 14, 2024 email is attached hereto as **Exhibit D**. Rather than proposing some
 16 compromise, Elvie’s case scheduling proposal (as shown in Ms. Kim’s May 14 email)
 17 actually *accelerated* certain deadlines, including the following:
 18

- 19 a. Moving the deadline for preliminary infringement contentions and
 20 disclosure of asserted claims from the current deadline of June 10, 2024,
 21 to May 31, 2024 (a proposed acceleration of 10 days);
- 22 b. Moving the deadline for exchange of preliminary claim constructions and
 23 extrinsic evidence from the current deadline of September 9, 2024, to
 24 August 7, 2024 (a proposed acceleration of 33 days); and

1 c. Moving the deadline for submission of the joint claim construction and
2 prehearing statement from the current deadline of October 3, 2024, to
3 September 16, 2024 (a proposed acceleration of 17 days).

4 4. By email dated May 14, 2024, Mr. Yang agreed to accept service of a
5 summons and Elvie's Amended Counterclaims on behalf of newly added counterclaim
6 defendant Shenzhen Xitao Network Technology Co., Ltd. A true and correct copy of that
7 email is attached hereto as **Exhibit E**.

8 5. Attached hereto as **Exhibit F** is a true and correct copy of the Order Granting
9 Stipulated Motion and Scheduling Order (Dkt. No. 29) issued by this Court on February 16,
10 2024, in *Fantasia Trading LLC v. Slice Engineering LLC*, No. 2:23-cv-01436-KKE.

11
12 I declare under penalty of perjury under the laws of the State of Washington that the
13 foregoing is true and correct.

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15 Executed in Seattle, Washington on this 4th day of June, 2024.

16
17 /s/ Jeremy Roller
18 Jeremy Roller
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CERTIFICATE OF SERVICE

I hereby certify that on this date I caused true and correct copies of the foregoing document to be served upon all attorneys of record using the automatic notification generated by the CM/ECF system.

Dated this 4th day of June, 2024, in Seattle, Washington.

/s/ Kaila Greenberg

Kaila Greenberg
Legal Assistant